

March 14, 2016

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

RE: In the Matter of Request for Review by Carr Telephone Company of Decision of Universal Service Administrator ("USAC"), CC Docket No. 02-6

To Whom It May Concern:

The following information is provided to appeal the denial of Carr Telephone Company's ("Carr" or "Company") Service Provider Invoice Numbers 2346396, 2342934 and 2342961, which were rejected by USAC due to being submitted after the respective acceptable invoice deadlines. Through this letter, Carr provides required and explanatory information to show good cause for granting an extension of the invoicing deadlines.

***Service Provider Contact Information:***

Service Provider Name	Carr Telephone Company
SPIN Number	143001699
Contact Person	Terri Bogner, Secretary/Treasurer
Contact Information	4325 S Masten Road Branch, MI 49402  231-898-2244  <a href="mailto:teri@carrinter.net">teri@carrinter.net</a>
Affected Form 471 Application Numbers and FRNs	2012: FRN 2375252, Form 471 # 870864  2013: FRNs 2529632, 2529591, 2529645, 2529739, all on Form 471 # 926556

***Explanation and Good Cause for Granting the Appeal:***

1. Carr Telephone Company is a family owned and managed company. In late 2012, Ruth Bogner, the last founding member and Matriarch of Carr Telephone Company, became ill and needed thrice weekly dialysis treatments. Each treatment required a full day of travel due to the rural location of Carr Telephone Company, and took four hours for the dialysis treatment once the dialysis center was reached. The responsibility of getting Ruth to her treatments fell upon Ruth's son (Mitchell, President/General Manager) and daughter (Terri, Secretary/Treasurer) who both actively work for Carr and manage all E-rate invoicing responsibilities. In June of 2013, Ruth's health declined significantly and she required constant supervision by either Mitchell or Terri, both at home and in the hospital as, when unsupervised, Ruth had experienced several falls, resulting in a broken collar bone on one occasion and a broken leg on another. Ruth passed away on October 5, 2013 (see obituary enclosed herein as Attachment A), and following her death, both Terri, as the executor of Ruth's estate, and Mitchell, were not only distraught with grief but also extremely inundated with settling the estate's affairs which did not conclude until December 31, 2014. This was a very stressful time for everyone at Carr, and E-rate invoicing responsibilities of the Company were unfortunately and inadvertently left unattended during this nearly two-year time span.

2. This is the first time that Carr has requested an extension in its many years of participation in the E-rate program. Carr works diligently to ensure compliance with all E-rate program rules and regulations, but due to the extreme and unfortunate circumstances of Ruth's health crisis over the latter part of 2012 and most of 2013, and the subsequent responsibilities involving settling Ruth's estate thereafter, many E-rate deadlines were inadvertently forgotten and delayed. The Company attempted to submit the 2013 invoices on February 11, 2016, and the 2012 invoice on February 18, 2016. Following herein as Attachment B please find copies of the USAC invoice rejection notices, received on February 16, 2016 and February 22, 2016, respectively. Therefore, this appeal to the FCC is timely filed, within sixty days of the USAC rejection notices.

3. Carr relies on E-rate funding to help provide telecommunications and internet access service to schools, libraries and consortia applicants in Carr's service area. The total reimbursement request for Carr's 2012 invoice number 2346396 was \$27,820.80. The rejected 2013 invoices 2342934 and 2342961 totaled \$84,870. Losing this combined total of \$112,690.80 in E-rate funding is a serious issue for Carr and is considered a significant revenue loss. This amount of E-rate funding was provided via discounts to the E-rate applicant, the West Shore Educational Service District (BEN # 131544). Therefore, the Company has exclusively borne the consequences of the invoicing rejections. Herein enclosed as Attachment C please find data from USAC's data retrieval tool highlighting the affected FRNs, and supporting the above-mentioned invoice amounts.

***Relief Being Sought Through this Appeal:***

Through this request, Carr Telephone Company, a small, family-owned and operated telecommunications company, has demonstrated that due to unforeseen, extraordinary and unfortunate circumstances, it was unable to meet E-rate invoicing deadlines for 2012 and 2013 funding years. Carr respectfully requests that the FCC issue an extension for Carr's 2012 and 2013 invoices to allow its funding requests totaling over \$112,690 to be honored by USAC.

Your prompt and thorough attention to this request is greatly appreciated. Should you have any questions related to this appeal, please contact the undersigned via the above-listed contact information.

Sincerely,

A handwritten signature in blue ink that reads "Terri Bogner". The signature is written in a cursive, flowing style.

Terri Bogner, Secretary/Treasurer  
Carr Telephone Company

Enclosures

cc: USAC – Schools and Libraries – Correspondence Unit  
via Fax at (973) 599-6526

**ATTACHMENT A**  
**OBITUARY FOR MS. RUTH BOGNER**



## **OBITUARY**

Ruth Sophie Bogner, 89, a lifelong resident of Carr Settlement passed away peacefully October 5, 2013 at her home surrounded by her family.

She died from congestive heart failure while under Heartland Hospice Care.

Ruth was born Biruta Sophie Maleckas on April 27, 1924 and grew up in Custer, Michigan with her two siblings and parents Frank and Valeria Maleckas who migrated from Lithuania to the United States in 1906. Ruth graduated from Custer High School in 1942. In June of 1942 she eloped and married Otto Raphael Bogner in Manistee.

Otto was drafted into World War II and Ruth lived in Custer, Muskegon and North Carolina while Otto served as a Sergeant during World War II. When the war ended, they moved to Carr, Michigan in 1945 and together they operated a small dairy farm for 36 years and the Carr Telephone Company. Ruth served as Treasurer for the Company for 46 years. In her spare time Ruth loved her flower gardens and grew many beautiful flowers and trees. Ruth also loved playing bingo, shopping for jewelry, travelling, and spending time with her family. She was a lifetime member of St. Mary's Church in Custer.

Surviving are her children, Cheryl Bogner of Mt. Clemens, Roger Bogner of Ludington, Ronald (Rhonda) Bogner of Muskegon, Mitchel (Toni) Bogner of Branch and Terri Bogner(Wayne)Rinkevicz of Branch. A sister, Veronica (Robert) Pochyla of Shelby and eight grandchildren, Renay Bogner Mihalek, Chris Bogner, Brooke, Kyle and Cody Bogner, Tom and Rachel Bogner, and Rosemary Hoffman. Three great-grandchildren, Ethan Bogner, Rylen and Rhys Mihalek and two special dogs, Lacey and Ziggy.

She was preceded in death by her husband, Otto in 1991, an infant daughter, Mary in 1964, brother, Frank Maleckas, Jr. in 2013.

Funeral Services will be held at St. Mary's Church in Custer with Father Joe Fixx officiating on October 9, at 11:00 am. Interment at Riverside Cemetery in Custer.  
Immediately following the interment a luncheon at St. Mary's Rectory will be served.

Visitation will be held at Wyman's (Stephen's) Funeral Home in Scottville from 6 to 9 pm on Tuesday evening, October 8.

**ATTACHMENT B**  
**SUPPORTING REJECTION NOTIFICATIONS FROM USAC**

143001699|Carr Telephone  
Company|teri@carrinter.net|usacstatement@universalservice.org|1|\$0.00|Sch  
ools And Libraries|As of February 22, 2016  
SPI|143001699|WSESD 2012|2375252|"SLD Invoice Number:2346396;Line Item  
Detail Number:7835805;Amount Requested:27820.80;Invoice Received Date  
[02/18/2016] Later Than Invoice Acceptable End Date  
[10/28/2014];12;Billed Date after [06/30/2013] fund yr;mnthly  
cost;76;Billed Date Outside of Funding Year;285;"|062013|\$0.00

Your Total Actual Disbursement: \$0.00.

*USAC REJECTION*



143001699|Carr Telephone  
Company|teri@carrinter.net|usacstatement@universalservice.org|4|\$0.00|Sch  
ools And Libraries|As of February 16, 2016  
SPI|143001699|WSESD Voip|2529632|"SLD Invoice Number:2342934;Line Item  
Detail Number:7826718;Amount Requested:44910.00;Invoice Received Date  
[02/11/2016] Later Than Invoice Acceptable End Date  
[01/28/2015];12;"1062014|\$0.00  
SPI|143001699|WSESD 2013|2529591|"SLD Invoice Number:2342961;Line Item  
Detail Number:7826770;Amount Requested:25920.00;Invoice Received Date  
[02/11/2016] Later Than Invoice Acceptable End Date  
[10/28/2014];12;"1062014|\$0.00  
SPI|143001699|WSESD 2013|2529645|"SLD Invoice Number:2342961;Line Item  
Detail Number:7826773;Amount Requested:9720.00;Invoice Received Date  
[02/11/2016] Later Than Invoice Acceptable End Date  
[10/28/2014];12;"1062014|\$0.00  
SPI|143001699|WSESD 2013|2529739|"SLD Invoice Number:2342961;Line Item  
Detail Number:7826774;Amount Requested:4320.00;Invoice Received Date  
[02/11/2016] Later Than Invoice Acceptable End Date  
[10/28/2014];12;"1062014|\$0.00

Your Total Actual Disbursement: \$0.00.

USAC REJECTION



**ATTACHMENT C**

**SUPPORTING DOCUMENTATION FROM USAC'S DATA RETRIEVAL TOOL**

471

## Application

Number	FRN	Applicant Name	BEN	SPIN	Service Provider Name	Funding Year	Last Date to Invoice	Orig FRN Service Type	Cmt'd Discount	Cmt'd Commitment Request	Invoicing Mode	Total Authorized Disbursement
926556	2529739	WEST SHORE E S D	131544	143001699	Carr Telephone Company	2013	10/28/2014	TELCOMM SERVICES	90	\$4,320.00	SPI	\$0.00
926556	2529645	WEST SHORE E S D	131544	143001699	Carr Telephone Company	2013	10/28/2014	TELCOMM SERVICES	90	\$9,720.00	SPI	\$0.00
926556	2529591	WEST SHORE E S D	131544	143001699	Carr Telephone Company	2013	10/28/2014	INTERNET ACCESS	90	\$25,920.00	SPI	\$0.00
926556	2529632	WEST SHORE E S D	131544	143001699	Carr Telephone Company	2013	1/28/2015	TELCOMM SERVICES	90	\$44,910.00	SPI	\$0.00
870864	2375252	MASON LAKE I S D	131544	143001699	Carr Telephone Company	2012	10/28/2014	TELCOMM SERVICES	90	\$27,820.80	SPI	\$0.00